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OCT 16 2017 PD

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUnited States District Court
Northern District of Illinois

Shirley Beecham

Plaintiff

1:17-cv-07497

Judge Robert M. Dow

Magistrate Judge Sheila M. Finnegan

Dr. O. IDOWU MD. v.

Dr. Stuart A. Krauss MD.

Vanguard Medical Group, P.C.

Weiss Memorial Hospital

Defendant

Cause of Action

COMPLAINT

Batter

False imprisonment

Bodily mutilation

Violation of Illinois Wrongful Death Act

Medicare Fraud

(1) Plaintiff Shirley Beecham Pro Se filing a Medical Health Care Fraud claims against Defendants

(2) Defendants caused the death of Annie Beecham, the decedent, the mother of the Plaintiff October 16, 2017.

(3) Defendant's engaged in Medicare Fraud, made false claims to Medicare for Chemo Drugs to administered to Annie Beecham, the decedent, when she never had leukemia;

(4) Defendants administered the drugs to Annie Beecham to Justify Billing Medicare

(5) Annie Beecham, the decedent developed chemo therapy induced peripheral neuropathy that paralyzed her upper and lower extremities (legs and arms)

(6) Defendants Tried to reverse the paralysis by administering a variety of dangerous drugs that caused life threatening side effects

(7) Defendants developed a bed sore while in the Hospital that

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Developed into stage three bedsores. This caused the decedent's death. Death certificate indicated cause of death was a toxic encephalopathy. See exhibit

(8) Plaintiff will complete and amend this complaint

Shirley Beecham

Shirley Beecham
6118 N. Sheridan Rd #707
Chicago IL 60660
773-465-5313

Stage Three



Stage Four

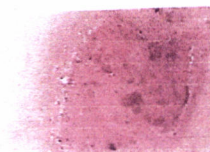
Bedsore Photographs

Stage One



This image displays a well-defined, superficial decubitus ulcer.

Stage Two



Cornell Law School

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U.S. Code › Title 18 › Part I › Chapter 63 › § 1347

18 U.S. Code § 1347 - Health care fraud

(a) Whoever knowingly and willfully executes, or attempts to execute, a scheme or artifice—

(1) to defraud any health care benefit program; or

(2) to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of, any health care benefit program,

in connection with the delivery of or payment for health care benefits, items, or services, shall be fined under this title or imprisoned not more than 10 years, or both. If the violation results in serious bodily injury (as defined in section 1365 of this title), such person shall be fined under this title or imprisoned not more than 20 years, or both; and if the violation results in death, such person shall be fined under this title, or imprisoned for any term of years or for life, or both.

(b) With respect to violations of this section, a person need not have actual knowledge of this section or specific intent to commit a violation of this section.

(Added Pub. L. 104–191, title II, § 242(a)(1), Aug. 21, 1996, 110 Stat. 2016; amended Pub. L. 111–148, title X, § 10606(b), Mar. 23, 2010, 124 Stat. 1008.)

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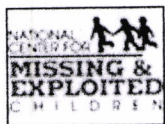
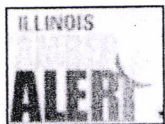
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Because the statute database is maintained primarily for legislative drafting purposes, statutory changes are sometimes included in the statute database before they take effect. If the source note at the end of a Section of the statutes includes a Public Act that has not yet taken effect, the version of the law that is currently in effect may have already been removed from the database and you should refer to that Public Act to see the changes made to the current law.

CIVIL LIABILITIES

(740 ILCS 180/) Wrongful Death Act.

(740 ILCS 180/0.01) (from Ch. 70, par. 0.01)

Sec. 0.01. Short title. This Act may be cited as the Wrongful Death Act.
(Source: P.A. 86-1324.)

(740 ILCS 180/1) (from Ch. 70, par. 1)

(Text of Section WITH the changes made by P.A. 89-7, which has been held unconstitutional)

Sec. 1. Whenever the death of a person shall be caused by wrongful act, neglect or default, and the act, neglect or default is such as would, if death had not ensued, have entitled the party injured to maintain an action and recover damages in respect thereof, then and in every such case the person who or company or corporation which would have been liable if death had not ensued, shall be liable to an action for damages, notwithstanding the death of the person injured, and although the death shall have been caused under such circumstances as amount in law to felony. No action may be brought under this Act if the decedent had brought a cause of action with respect to the same underlying incident or occurrence which was settled or on which judgment was rendered.

This amendatory Act of 1995 applies to causes of action accruing on or after its effective date.
(Source: P.A. 89-7, eff. 3-9-95.)

(Text of Section WITHOUT the changes made by P.A. 89-7, which has been held unconstitutional)

Sec. 1. Whenever the death of a person shall be caused by wrongful act, neglect or default, and the act, neglect or default is such as would, if death had not ensued, have entitled the party injured to maintain an action and recover damages in respect thereof, then and in every such case the person who or company or corporation which would have been liable if death had not ensued, shall be liable to an action for damages, notwithstanding the death of the person injured, and although the death shall have been caused under such circumstances as amount in law to felony.

(Source: Laws 1853, p. 97.)